

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

USGEN NEW ENGLAND, INC., a subsidiary
of NATIONAL ENERGY & GAS & GAS
TRANSMISSION, INC. f/k/a PG&E
NATIONAL ENERGY GROUP, INC.,

Plaintiff,

v.

BENTLY NEVADA, LLC f/k/a BENTLY
NEVADA CORPORATION, LLC; AND
BENTLY PRESSURIZED BEARING
COMPANY f/k/a BENTLY NEVADA
CORPORATION,

Defendants.

Civil Action No. 04 CV 12629 RWZ

PLAINTIFF'S MOTION FOR ADMISSION PRO HAC VICE

Plaintiff, USGEN New England, Inc., a subsidiary of National Energy & Gas & Gas Transmission, Inc. f/k/a Pg&e National Energy Group, Inc. ("USGEN"), by its undersigned counsel, moves, pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, for an order permitting Jason D. Bath, Esq. to appear on its behalf in this case.

As grounds for this motion, as set forth in the declaration of Jason D. Bath, attached hereto as Exhibit A, USGEN states as follows:

1. Jason D. Bath is a member in good standing in every jurisdiction where he has been admitted to practice;

2. There are no disciplinary proceedings pending against Jason D. Bath as a member of the bar of any jurisdiction; and

3. Jason D. Bath is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. Counsel for defendants does not oppose this motion.

WHEREFORE, USGEN respectfully requests that the Court permit Jason D. Bath to appear on its behalf in this matter.

Dated: August 30, 2005

Respectfully submitted,

USGEN NEW ENGLAND, INC., A
SUBSIDIARY OF NATIONAL ENERGY
& GAS & GAS TRANSMISSION, INC.
f/k/a PG&E NATIONAL ENERGY
GROUP, INC.,

By its attorneys,

/s/ Kathleen A. Kelley
Kathleen A. Kelley
BBO No. 562342
HARE & CHAFFIN
160 Federal Street, 23rd Fl.
Boston, MA 02110
617-330-5000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished this 30th day of August, 2005 by mail to counsel for the defendants.

/s/ Kathleen A. Kelley
Kathleen A. Kelley

453001.082605

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

USGEN NEW ENGLAND, INC., a
Subsidiary of NATIONAL ENERGY &
GAS TRANSMISSION INC., f/k/a
PG&E NATIONAL ENERGY GROUP,
INC.

Plaintiff

V.

BENTLY NEVADA, LLC., f/k/a
BENTLY NEVADA CORPORATION,
LLC and BENTLY PRESSURIZED
BEARING COMPANY, f/k/a BENTLY
NEVADA CORPORATION

Defendants

CIVIL ACTION NO. 04-12629-RWZ

DECLARATION OF JASON D. BATH IN
SUPPORT MOTION FOR ADMISSION PRO HAC VICE

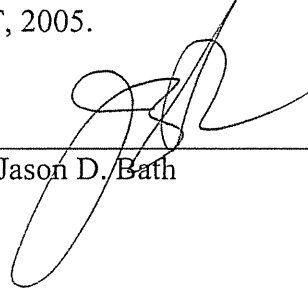
I, Jason D. Bath, declare, under the penalties of perjury, as follows:

1. I am a member of the firm of Donato, Minx and Brown, P.C., 3200 Southwest Freeway Ste 2310, Houston, Texas 7702-1112.
2. I am a member in good standing of the Bar of the State of Texas (2001). I am also admitted to practice in United States Court of Appeals for the Fifth Circuit (2002), the United States District Court for the Northern District of Texas (2001), the United States District Court for the Southern District of Texas (2001), the United States District Court for the Western District of Texas (2001), and the United States District Court for the Eastern District of Texas (2001),
3. This case involves factual and legal issues with which I am familiar. I have developed expertise in, and stay abreast of, the case law in this field.

4. I have reviewed and am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. For the foregoing reasons, I respectfully request that this Court allow me to appear and practice in this matter on behalf of plaintiff, USGEN New England, a subsidiary of National Energy & Gas & Gas Transmission, Inc. f/k/a PG&E National Energy Group, Inc.

SIGNED UNDER THE PENALTIES OF PERJURY
THIS 26th DAY OF AUGUST, 2005.



Jason D. Bath